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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GENERAL PATENT CORPORATION,

Plaintiff,

-against-

WI-LAN INC., GLADIOS IP INC.,
and PAUL J. LERNER, ESQ.

Defendants.

No. 11 Civ. 6585 (JFK-DCF)

**DECLARATION OF
KATHLENE INGHAM**

KATHLENE INGHAM declares:

1. I have been employed by General Patent Corporation ("GPC") since 1999. I currently hold the position of Director of Licensing at GPC, and have held this position since 2004. I have personal knowledge of the following facts and if called upon, I am prepared to testify thereto.

2. I have read the declaration of Alexander Poltorak dated November 4, 2011, which is being submitted in the above captioned matter, and have found it to be entirely truthful to the best of my knowledge.

3. I am generally familiar with the information provided in the Poltorak declaration regarding GPC's trade secrets, and I am particularly familiar with those related to GPC's triage processes for screening and choosing valuable submissions, and the confidential nature of the outside vendors used by GPC.

4. I have extensive first-hand knowledge of GPC's triage processes because I am primarily responsible for conducting the initial screening of patents that are submitted to GPC by prospective clients.

5. I am also responsible for retaining outside vendors to assist GPC in its triage processes. The existence of these outside vendors is a valuable asset, and the identity of the vendors is highly confidential.

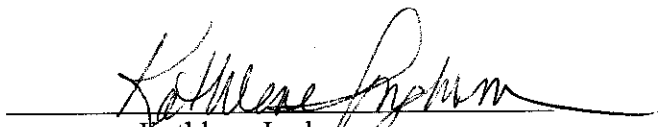
6. My understanding of GPC's trade secrets and the measures taken by GPC to protect those trade secrets is entirely consistent with what is set forth in the Poltorak declaration.

7. My understanding of these trade secrets, including their confidentiality, has remained consistent throughout the course of my employment at GPC.

8. As set forth in the Poltorak declaration, GPC maintains strict confidentiality and security policies to protect its valuable trade secrets.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 4, 2011.


Kathlene Ingham